

ORIGINAL

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PATRICIO JIMENEZ,

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PLAINTIFF,

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- against - Case No.
14 Civ. 2994 (SAS) (FM)

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THE CITY OF NEW YORK, DETECTIVE JAMES
QUILTY, DETECTIVE MIGUEL LOPEZ, and
9 JOHN/JANE DOE #1,

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DEFENDANTS.

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DATE: June 15, 2015

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TIME: 12:07 p.m.

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EXAMINATION BEFORE TRIAL of the

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Defendant, DETECTIVE JAMES QUILTY, taken by

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the Plaintiff, pursuant to a Court Order and

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the Federal Rules of Civil Procedure, held

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at the offices of Gregory P. Mouton, Esq.,

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305 Broadway, New York, New York 10007,

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before Millie Yee, a Notary Public of the

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State of New York.

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2 A P P E A R A N C E S:

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4 GREGORY P. MOUTON, ESQ.
Attorney for Plaintiff
5 305 Broadway, 14th Floor
New York, New York 10007
6 BY: GREGORY P. MOUTON, ESQ.
FILE #: 32

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ZACHARY W. CARTER, ESQ.
9 CORPORATION COUNSEL
NEW YORK CITY LAW DEPARTMENT
10 Attorney for Defendants
100 Church Street
11 New York, New York 10007
BY: TOBIAS E. ZIMMERMAN, ESQ.
12 FILE #: 2014-015603

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F E D E R A L S T I P U L A T I O N S

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IT IS HEREBY STIPULATED AND AGREED by and

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between the counsel for the respective

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parties herein that the sealing, filing, and

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certification of the within deposition be

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waived; that the original of the deposition

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may be signed and sworn to by the witness

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before anyone authorized to administer an

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oath, with the same effect as if signed

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before a Judge of the Court; that an

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unsigned copy of the deposition may be used

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with the same force and effect as if signed

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by the witness, 30 days after service of

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the original 1 & copy of same upon counsel

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for the witness.

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IT IS FURTHER STIPULATED AND AGREED that

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all objections except as to form, are

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reserved to the time of trial.

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* * * *

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1 DETECTIVE J. QUILTY

2 D E T E C T I V E J A M E S Q U I L T Y,
3 called as a witness, having been first duly
4 sworn by a Notary Public of the State of New
5 York, was examined and testified as follows:

6 EXAMINATION BY

7 MR. MOUTON:

8 Q. Please state your name for the
9 record.

10 A. Detective James Quilty.

11 Q. Where do you reside?

12 A. 250 West 135th Street, New York,
13 New York 10030.

14 MR. ZIMMERMAN: Before we start,
15 can I just say on the record my
16 understanding is that the courts
17 ordered this deposition be two hours so
18 I'm not going to cut you off right at
19 two hours but I will give you leeway,
20 but I expect we're not going to waste a
21 lot of time.

22 MR. MOUTON: The courts directed
23 that the two witnesses that are going
24 to appear tomorrow are two hours long,
25 not Detective Quilty and not Detective

1 DETECTIVE J. QUILTY

2 A. It would be a SPRINT or ICAT.

3 Depending on -- I don't know when they
4 switched, the dates, from SPRINT to ICAT.

5 Q. Can you tell me what information
6 about this particular incident you learned.

7 A. States that first --

8 MR. ZIMMERMAN: Objection, assumes
9 facts not in evidence.

10 Q. Did you review this prior to
11 attempting to interview Mrs. Jimenez?

12 A. It would have been -- I don't know
13 if it's this particular one, but it has a
14 phone number so I was able to get a number
15 for the individual.

16 Q. Now, if it wasn't this particular
17 document that you reviewed, what other
18 document would it have been?

19 A. It would be similar to this, it
20 would be an ICAT or a SPRINT report.

21 Q. Would it have the same information
22 as this particular document?

23 A. Generally yes.

24 Q. What other types of information
25 would it have?